

**Commonwealth of Kentucky  
Environmental and Public Protection Cabinet  
Department for Environmental Protection  
Division for Air Quality  
803 Schenkel Lane  
Frankfort, Kentucky 40601  
(502) 573-3382**

**Proposed**

**AIR QUALITY PERMIT  
Issued under 401 KAR 52:020**

**Permittee Name:** Eagle Industries Inc.  
**Mailing Address:** 601 Double Spring Road, Bowling Green,  
KY 42101

**Source Name:** Eagle Industries Inc.  
**Mailing Address:** 601 Double Spring Road, Bowling Green,  
KY 42101


**Source Location:** 601 Double Spring Road, Bowling Green,  
KY 42101

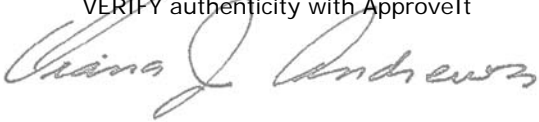
**Permit Number:** V-05-013  
**Source A. I. #:** 4107  
**Activity #:** APE20050001  
**Review Type:** Operating, TitleV, Synthetic Minor  
**Source ID #:** 21-227-00096

**Regional Office:** Bowling Green Regional Office  
1507 Westen Avenue, Bowling Green, KY 42101  
  
(270) 746-7475

**County:** Warren

**Application**  
**Complete Date:** March 2, 2005  
**Issuance Date:** December 27, 2005  
**Revision Date:**  
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E-Signed by Diana Andrews  
VERIFY authenticity with ApproveIt 



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**John S. Lyons, Director  
Division for Air Quality**

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## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

### **EP 01 (01) Hope Street Plant (Building #4)**

Toner booth (Applicators: 1-H-1, 1-H-2, 1-H-3 and 1-H-4)

Stain booth (Applicators: 2-H-1, 2-H-2, 2-H-3 and 2-H-4)

Drying oven

Sealer booth (Applicator: 3-H-1)

Drying oven

Topcoat spray booth (Applicators: 4-H-1 and 4-H-2)

Drying oven

Offline - Top coat booth (Applicators: 5-H-1, 5-H-2, 5-H-3, 5-H-4 and 5-H-5)

Offline - Toner/sealer booth (Applicators: 6-H-1, 6-H-3 and 6-H-2)

Offline - Toner/stain booth (Applicator: 7-H-1)

Control equipment: Fiber glass filters

Claimed efficiency: 95%.

Construction commenced: 9/1993 and 11/1995

### **APPLICABLE REGULATIONS:**

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, is applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2.

401 KAR 59:010, New process operations, applicable to each affected facility or source associated with process operations, which are not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

401 KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

#### **1. Operating Limitations:**

The rate of materials used in affected facilities shall not produce emissions which exceed the limitations as described in Section B(2) below.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****2. Emission Limitations:**

- a. Volatile organic compound (VOC) emissions shall be less than or equal to 225 tons per rolling 12 month period for the Hope Street Plant.

**Compliance Demonstration Method:**

Compliance with VOC shall be demonstrated by a material balance method consisting of record keeping of primers, base coats, top coats, and solvent utilized, VOC content and resulting emissions, which will be summarized on a monthly basis. The equation for monthly record keeping is as follows:

Monthly VOC emission =  $\sum$ [Monthly usage of each sealer, stain, topcoat, solvent, thinner diluent, or any other VOC containing material in pounds or gallons per month] x [VOC fraction] x [appropriate conversion factor (if usage is in gallons) for gallons to pounds for each coating, solvent thinner, diluent, or any other VOC containing material used]

- b. 401 KAR 59:010, New process operations,  
Section 3, PM emissions shall not exceed the hourly allowable rate of 2.34 lbs/hr, per booth.

**Compliance Demonstration Method:**

Compliance with the mass emission limit is assumed when the filter system controls the emissions of particulate matter and is operated properly in accordance with manufacturer's specifications and/or standard operating procedures as approved by the Division.

- c. 401 KAR 59:010, New process operations,  
Section 3, Visible emissions shall not equal or exceed 20% opacity.

**Compliance Demonstration Method:**

The permittee shall perform a qualitative visual observation of the opacity of emissions from each spray booth stack on a weekly basis and maintain a log of the observations. If visible emissions from the stack are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

- d. 401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

**Compliance Demonstration Method:**

The source is in compliance with 401 KAR 63:020 based on the emission rates of toxics given in the application submitted by the source. If the source alters process rates, material formulations, or any other factor that would result in an increase of

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

toxic emissions or the addition of toxic emissions not previously evaluated by the Division, the source shall submit the appropriate application forms pursuant to 401 KAR 52:020, Section 3(1)(a), along with modeling to show that the facility will remain in compliance with 401 KAR 63:020.

**3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Monitoring Requirements:** See compliance demonstration method B2(c)**5. Specific Record Keeping Requirements:**

The permittee shall keep calendar month records of the usage of sealer, stain, topcoats, solvents and clean up solvents or any other VOC containing material. At the end of each month volatile organic compound (VOC) emissions shall be calculated and recorded. These records shall be summarized and tons per month VOC emissions calculated and recorded. Tons of VOC per 12 months shall be recorded. The recorded tons per 12 months shall be a 12 months rolling total representing the most recent year. In addition, those records shall comply with VOC emissions limitations listed in this permit for each conditional major limitation. These records, as well as purchase orders and invoices for all VOC containing materials, shall be made available for inspection upon request by duly authorized representatives of the Division for Air Quality.

**6. Specific Reporting Requirements:**

- a. Any deviations from requirements of section B shall be reported.
- b. The VOC emission calculation for each month in the semi-annual period shall be reported.
- c. The rolling 12 month total for VOC during each month in the semi-annual period shall be reported.
- d. See Group Requirements and Section F(2)

**7. Specific Control Equipment Operating Conditions:**

Panel filters shall be in place at all times when the spray booths are operating and shall be cleaned/replaced as often as needed to comply with the emission limitations.

**8. Alternate Operating Scenarios:** None**9. Compliance Schedule:** None

## **SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **EP 02 Curio Finishing Line**

Sealer/toner booth (Applicators: 1-C-1, 1-C-2, 1-C-3, 1-C-4, 1-C-5 and 1-C-6)

Topcoat booth (Applicators: 2-C-1, 2-C-2, 2-C-3, 2-C-4, 2-C-5 and 2-C-6)

Sealer booth (Applicators: 3-C-1, 3-C-3 and 3-C-2)

Stain booth (Applicators: 4-C-1, 4-C-2 and 4-C-3)

Control equipment: Fiberglass filters

Claimed efficiency: 95%.

Construction Dates: 6/1998

### **EP 03 D. C. Finishing Line**

Sealer/topcoat booth (Applicators: 1-D-1, 1-D-2, 1-D-3, 1-D-4 and 1-D-5)

Sealer/Paint booth (Applicators: 2-D-1 and 2-D-2)

Sealer/clear coat booth (Applicators: 3-D-1, 3-D-2, 3-D-3 and 3-D-4)

Control equipment: Fiberglass filters

Claimed efficiency: 95%

Construction Commenced: 6/2000

### **APPLICABLE REGULATIONS:**

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, is applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2.

401 KAR 59:010, New process operations, applicable to each affected facility or source associated with process operations, which are not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

401 KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

#### **1. Operating Limitations:**

The rate of materials used in affected facilities shall not produce emissions which exceed the limitations as described in Section B(2) below.

#### **2. Emission Limitations:**

- a. Volatile organic compound (VOC) emissions for emission points EP #2 and EP #3 shall be less than or equal to 225 tons per rolling 12 month period for the Main Street Plant.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****Compliance Demonstration Method:**

Compliance with VOC shall be demonstrated by a material balance method consisting of record keeping of primers, base coats, top coats, and solvent utilized, VOC content and resulting emissions, which will be summarized on a monthly basis. The equation for monthly record keeping is as follows:

Monthly VOC emission =  $\Sigma$ [Monthly usage of each sealer, stain, topcoat, solvent, thinner diluent, or any other VOC containing material in pounds or gallons per month] x [VOC fraction] x [appropriate conversion factor (if usage is in gallons) for gallons to pounds for each coating, solvent thinner, diluent, or any other VOC containing material used]

- b. 401 KAR 59:010, New process operations,  
Section 3, PM emissions shall not exceed the hourly allowable rate of 2.34 lbs/hr, per booth.

**Compliance Demonstration Method:**

Compliance with the mass emission limit is assumed when the filter system controls the emissions of particulate matter and is operated properly in accordance with manufacturer's specifications and/or standard operating procedures as approved by the Division.

- c. 401 KAR 59:010, New process operations,  
Section 3, Visible emissions shall not equal or exceed 20% opacity.

**Compliance Demonstration Method:**

The permittee shall perform a qualitative visual observation of the opacity of emissions from each spray booth stack on a weekly basis and maintain a log of the observations. If visible emissions from the stack are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

- d. 401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

**Compliance Demonstration Method:**

The source is in compliance with 401 KAR 63:020 based on the emission rates of toxics given in the application submitted by the source. If the source alters process rates, material formulations, or any other factor that would result in an increase of toxic emissions or the addition of toxic emissions not previously evaluated by the Division, the source shall submit the appropriate application forms pursuant to 401 KAR 52:020, Section 3(1)(a), along with modeling to show that the facility will remain in compliance with 401 KAR 63:020.



**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Monitoring Requirements:** See compliance demonstration method B2(c)**5. Specific Record Keeping Requirements:**

The permittee shall keep calendar month records of the usage of sealer, stain, topcoats, solvents and clean up solvents or any other VOC containing material. At the end of each month volatile organic compound (VOC) emissions shall be calculated and recorded. These records shall be summarized and tons per month VOC emissions calculated and recorded. Tons of VOC per 12 months shall be recorded. The recorded tons per 12 months shall be a 12 months rolling total representing the most recent year. In addition, those records shall comply with VOC emissions limitations listed in this permit for each conditional major limitation. These records, as well as purchase orders and invoices for all VOC containing materials, shall be made available for inspection upon request by duly authorized representatives of the Division for Air Quality.

**6. Specific Reporting Requirements:**

- a. Any deviations from requirements of section B shall be reported.
- b. The VOC emission calculation for each month in the semi-annual period shall be reported.
- c. The rolling 12 month total for VOC during each month in the semi-annual period shall be reported.
- d. See Group Requirements and Section F(2)

**7. Specific Control Equipment Operating Conditions:**

Panel filters shall be in place at all times when the spray booths are operating and shall be cleaned/replaced as often as needed to comply with the emission limitations.

**8. Alternate Operating Scenarios:** None**9. Compliance Schedule:** None

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****GROUP REQUIREMENTS:****EP 01, EP 02 and EP 03****APPLICABLE REGULATIONS:**

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2.

**Existing source: EP 01****New source: EP 02 and EP 03****1. Operating Limitations:**

- A. 40 CFR 63.803(a), **WORK PRACTICE IMPLEMENTATION PLAN:** The permittee shall maintain the written work practice implementation plan. The written work practice implementation plan shall be available for inspection by the Division for Air Quality (DAQ) upon request. If the DAQ determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (B) through (J) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the DAQ may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
- B. 40 CFR 63.803(b), **OPERATOR TRAINING:** Personnel involved in finishing, gluing, cleaning, and wash off operations shall be trained in appropriate application, cleaning, and wash off procedures, equipment setup and adjustment to minimize finishing material usage and over spray, and appropriate management of cleanup wastes. This training shall be completed within six months of the compliance date (December 7, 1998) for existing personnel. New personnel shall be trained upon hiring. All personnel shall be given refresher training annually.
- C. 40 CFR 63.803(e), **WASHOFF AND CLEANING SOLVENTS:** Cleaning or wash off solvents that contain any of the pollutants listed in 40 CFR 63, Subpart JJ, Table 4, in concentrations subject to MSDS reporting as required by OSHA, shall not be used. Emissions from wash off shall be further controlled by using normally closed tanks to contain wash off, and orientation of the part to drain as much solvent as possible.
- D. 40 CFR 63.803(f), **SPRAY BOOTH CLEANING:** Compounds containing more than 8.0 percent by weight of VOC shall not be used for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- E. 40 CFR 63.803(i and j), **LINE AND GUN CLEANING:** Normally closed containers shall be used to contain all organic solvent used to clean lines and spray guns.
- F. 40 CFR 63.803(g), **STORAGE REQUIREMENTS:** Normally closed containers shall be used for storing finishing, gluing, cleaning, and wash off materials.
- G. 40 CFR 63.803(h), **APPLICATION EQUIPMENT REQUIREMENTS:** Conventional air spray guns shall be used to apply finishing materials only under any of the following circumstances:
- (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
  - (2) For touch up and repair under the following conditions:
    - (a) The touch up and repair occurs after completion of the finishing operation;  
or
    - (b) The touch up and repair occurs after the application of stain and before the application of any other type of finishing material and the material used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.
  - (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually.
  - (4) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period.
- H. 40 CFR 63.803(c), **LEAK INSPECTION REQUIREMENTS:** As a minimum, all equipment used to transfer or apply coatings, adhesives, or organic solvents shall be visually inspected once per month. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected, and final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- I. 40 CFR 63.802(a)(2), **ADHESIVES:** Volatile Hazardous Air Pollutant (VHAP) content of contact adhesives applied to porous substrates shall not exceed 1.0 lb VHAP/lb solids as applied.
- J. **Formulation assessment plan for finishing operations.** The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
- (1) Identifies VHAP from the list presented in Table 5 of **subpart JJ** that are being used in finishing operations by the affected source;

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- (2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (J)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (J)(1) of this section.
- (3) Tracks the annual usage of each VHAP identified in (J)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
- (4) If, after November 1998, the annual usage of the VHAP identified in paragraph (J)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
  - (i) The exceedance is no more than 15.0 percent above the baseline level;
  - (ii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
  - (iii) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied

**2. Emission Limitations: 40 CFR 63:802**

- A. For the **existing affected source (EP 01)** the permittee shall:
  - (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this **subpart JJ**, using any of the compliance methods in Sec. 63.804(a).
  - (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

For all contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 lb VHAP/lb solids, as applied.
  - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids, as applied.
- B. For the **new affected source (EP 02)** the permittee shall:
  - (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this **subpart JJ** using any of the compliance methods in Sec. 63.804(d).
  - (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 lb VHAP/lb solids.
  - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids, as applied.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****Compliance Demonstration****Sec. 63.804 Compliance procedures and monitoring requirements.**

A. For the **existing affected source (EP 01)** the permittee shall comply with the following provision presented in Sec. 63.804.

- (1) [CFR 63.804 (a)(1)] Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

- (2) [CFR 63.804 (a)(2)] Use compliant finishing materials according to the following criteria:

- (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
- (ii) Demonstrate that each wash coat and base coat that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
- (iii) Demonstrate that each wash coat and base coat, that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight.

B. For the **new affected source (EP 02)** the permittee may comply with those provisions by using any of the following methods:

- (1) [CFR 63.804 (d)(1)] Calculate the average VHAP content across all finishing materials used at the facility using Equation 1 described in Section A above, and maintain a value of E no greater than 0.8;

- (2) [CFR 63.804 (d)(2)] Use compliant finishing materials according to the following criteria:

- (i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied, each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
- (ii) Demonstrate that each wash coat and base coat that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight;

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- (iii) Demonstrate that each wash coat and base coat that is formulated onsite is formulated using a finishing material containing no more than 0.8 lb VHAP/lb solids and a thinner containing no more than 3.0 percent HAP by weight.
  - C. For the **new affected source** subject to Sec. 63.802(b)(2) the permittee shall comply with the provisions using the following methods:  
Use compliant contact adhesives with a VHAP content no greater than 0.2 lb VHAP/lb solids, as applied.
  - D. **Initial compliance.**
    - (i) The permittee shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by Sec. 63.807. The first month's calculation shall include data for the entire month in which the compliance date falls.
    - (ii) The permittee shall submit an initial compliance status report, as required by Sec. 63.807, stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.
  - E. **Continuous compliance demonstrations.** The permittee shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Sec. 63.807.
    - (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
    - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
3. **Testing Requirements:**  
Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.
4. **Monitoring Requirements:** See Section F
5. **Specific Record Keeping Requirements:**  
A. The permittee shall maintain records of the following:  
(1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in the Item 2; and

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- (2) The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Item 2; and
    - (3) The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in the Item 2.
  - B. The permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
  - C. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
    - (4) Records demonstrating that the operator training program required by Item 1 is in place;
    - (5) Records collected in accordance with the inspection and maintenance plan required by Item 1.
    - (6) Records associated with the cleaning solvent accounting system required by Item 1;
    - (7) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by Item 1.
    - (8) Records associated with the formulation assessment plan required by Item 1; and
    - (9) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
  - D. The permittee shall maintain records of the compliance certifications submitted in accordance with Item 2 for each semiannual period following the compliance date.
6. **Specific Reporting Requirements:** 40 CFR 63.807
- No later than 60 days after startup**
- A. 40 CFR 63.804, **INITIAL COMPLIANCE STATUS REPORT:** Stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.
- Within 30 calendar days after the end of the first six month period of operation, and each six months thereafter**
- B. 40 CFR 63.804, **COMPLIANCE CERTIFICATION** signed by a responsible official of the company that owns or operates the affected source to include:
    - (1) Statement that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
    - (2) Statement that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

(3) Statement of whether or not the affected source was in compliance, and if not, what measures were taken to bring the affected source in compliance.

- C. These Conditions 1, 5, and 6 (Operating limitations, Record keeping, and Reporting) are intended to convey the requirements of 40 CFR Part 63, Subpart JJ, as applicable to the affected facilities permitted herein. This does not release the owner \ operator of this source from responsibility for any requirements of Subpart JJ. not specifically stated in this permit.



**SECTION C - INSIGNIFICANT ACTIVITIES**

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

<u>Description</u>	<u>Generally Applicable Regulation</u>
<b>Building #4</b>	
1. Cutting / assembly	59:010, 63:010
2. Hand sanding	59:010, 63:010
3. Panels Glue	NA
4. Wood putty	NA
5. Wood polish	NA
6. Glass cutting	NA
7. Natural Gas heater	59:015
<b>Building #17 and Building D. C.</b>	
1. Cutting / assembly	59:010, 63:010
2. Hand sanding	59:010, 63:010
3. Panels Glue	NA
4. Wood putty	NA
5. Wood polish	NA
6. Glass cutting	NA
7. Natural Gas heater	59:015

**SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS**

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
2. a. For Emission Point #1 VOC emissions shall be less than 225 tons per rolling 12 months

**Compliance Demonstration Method for VOC:**

Monthly source wide VOC emissions =  $\sum$ VOC emissions from wood furniture finishing lines  
+  $\sum$ VOC emissions from natural gas burning units  
+  $\sum$ VOC emissions from insignificant activities.

When the total VOC emissions from the given month are added to the previous eleven (11) month totals, the new 12-month rolling total shall not exceed 225 tons.

- b. For Emission Point #2 and #3 VOC emissions shall be less than 225 tons per rolling 12 months.

**Compliance Demonstration Method for VOC:**

Monthly source wide VOC emissions =  $\sum$ VOC emissions from wood furniture finishing lines  
+  $\sum$ VOC emissions from natural gas burning units  
+  $\sum$ VOC emissions from insignificant activities.

When the total VOC emissions from the given month are added to the previous eleven (11) month totals, the new 12-month rolling total shall not exceed 225 tons.

## **SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS**

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

## **SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS**

1. Pursuant to Section 1b (IV)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
  - a. Date, place as defined in this permit, and time of sampling or measurements;
  - b. Analyses performance dates;
  - c. Company or entity that performed analyses;
  - d. Analytical techniques or methods used;
  - e. Analyses results; and
  - f. Operating conditions during time of sampling or measurement.
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b(IV) 2 and 1a(8) of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
3. In accordance with the requirements of 401 KAR 52:020 Section 3(1)h the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
  - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
  - b. To access and copy any records required by the permit;
  - c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
5. Summary reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Section 1b (V )1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

## **SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020 Section 23. All deviations from permit requirements shall be clearly identified in the reports.
7. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
  - a. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
  - b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request.
8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7. above) to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F.6 [Section 1b (V) 3, 4. of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
9. Pursuant to 401 KAR 52:020, Permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
  - a. Identification of the term or condition;
  - b. Compliance status of each term or condition of the permit;
  - c. Whether compliance was continuous or intermittent;
  - d. The method used for determining the compliance status for the source, currently and over the reporting period.
  - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

**SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

- f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality  
Bowling Green Regional Office  
1508 Westen Avenue  
Bowling Green, KY 42104

U.S. EPA Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960

Division for Air Quality  
Central Files  
803 Schenkel Lane  
Frankfort, KY 40601

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee.
11. Pursuant to Section VII (3) of the policy manual of the Division for Air Quality as referenced in 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days after the completion of the fieldwork.

**SECTION G - GENERAL PROVISIONS****(a) General Compliance Requirements**

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a, 3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a, 6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
  - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
  - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
  - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the conditions of this permit [Section 1a, 7,8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

## SECTION G - GENERAL PROVISIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a, 14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a, 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a, 15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a, 10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3)(b)].
11. This permit does not convey property rights or exclusive privileges [Section 1a, 9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3)(d)].
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3)(a)].
15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.



## SECTION G - GENERAL PROVISIONS (CONTINUED)

16. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with:
  - a. Applicable requirements that are included and specifically identified in the permit and
  - b. Non-applicable requirements expressly identified in this permit.

### (b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].
2. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020 Section 8(2)].

### (c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

### (d) Construction, Start-Up, and Initial Compliance Demonstration Requirements None

### (e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

### (f) Emergency Provisions

1. Pursuant to 401 KAR 52:020 Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
  - a. An emergency occurred and the permittee can identify the cause of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
  - e. This requirement does not relieve the source of other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

### (g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

RMP Reporting Center  
P.O. Box 1515  
Lanham-Seabrook, MD 20703-1515.

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

### (h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

## **SECTION G - GENERAL PROVISIONS (CONTINUED)**

- a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166
  - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

**SECTION H - ALTERNATE OPERATING SCENARIOS**

None

**SECTION I - COMPLIANCE SCHEDULE**

None